#:2516

Filed 10/03/24 Page 1 of 5 Page ID

Case 2:22-cv-06137-SSS-JC Document 133

#:2517

Filed 10/03/24 Page 2 of 5 Page ID

Case 2:22-cv-06137-SSS-JC Document 133

Opulent Treasures, Inc., Ya Ya Creations, Inc. and Ya Ya Logistics, Inc. hereby submit the following Joint Stipulation to seal the previously filed letter of Carol Wilson, filed as Docket Number 131 in Case No. 2:22-cv-6137, on the basis that the letter is replete with highly confidential settlement discussions and trade secret information that was provided pursuant to a protective order.

For example, the entirety of page 3 of the letter is a detailed summary of several confidential settlement hearings between the parties. Page 3 lists confidential sales, profit and settlement offer information all of which were provided pursuant to a protective order and which need to be filed under seal to protect the parties. Sales and profit information is repeated on page 5 as well as references to a confidential expert report of Shelly Irvine. The report of Ms. Irvine was designated as confidential because the report relied on trade secret sales and profit information of Ya Ya Creations, Inc. that was produced as confidential pursuant to the protective order entered in consolidated case 2:22-cv-02616.

Accordingly, the parties jointly request that Docket Number 131 in Case No. 2:22-cv-6137 be removed from the public record and placed under seal.

Respectfully submitted:

Date: October 3, 2024

BOIES SCHILLER FLEXNER LLP

By: __/John Kucera/_

John Kucera

2029 Century Park East, Suite 1520 Los Angeles, California 90067 Telephone: (213) 629-9040 Email: jkucera@bsfllp.com Attorney for Plaintiff OPULENT TREASURES, INC.

KARISH & BJORGUM, PC Date: October 3, 2024 By: /Marc Karish/ Marc A. Karish 119 E. Union Street, Suite B Pasadena, CA 91103 Telephone: (213) 791-2602 Email: marc.karish@kb-ip.com Attorneys for Defendants YA YA CREATIONS, INC. and YA YA LOGISTICS, INC.

#:2519

Case 2:22-cv-06137-SSS-JC Document 133

Filed 10/03/24 Page 4 of 5 Page ID

1	
2	CERTIFICATE OF SERVICE
3	A copy of the Joint Stipulation to File Under Seal Letter From Carol Wilson
4	(Docket Number 131 in Case No. 2:22-cv-6137) was served upon the parties to
5	this matter via the Court's CM/ECF system and via email on October 3, 2024.
6	/s/ Marc A. Karish
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	-

Case 2:22-cv-06137-SSS-JC Document 133 Filed 10/03/24 Page 5 of 5 Page ID #:2520